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*Attorneys for Defendant
GreatPlains Finance, LLC
d/b/a Cash Advance Now*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RASHONNA M. RANSOM,
Plaintiff,

v.

GREATPLAINS FINANCE, LLC d/b/a
CASH ADVANCE NOW

Defendant.

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Civil Action No. 2:22-cv-01344
(WJM)

**DECLARATION OF JEFFREY
STIFFARM IN SUPPORT OF
DEFENDANT GREATPLAINS
FINANCE, LLC d/b/a CASH
ADVANCE NOW'S MOTION TO
DISMISS**

I, JEFFREY STIFFARM, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the President of the Fort Belknap Indian Community Council, the elected governing body of the Fort Belknap Indian Tribe (the FBIC or the Tribe). I

am an enrolled member of the Tribe, over eighteen years of age, and I am familiar with the facts stated in this declaration and could testify to them if called to do so.

2. The Tribe is a federally recognized Indian tribe located in rural northern Montana. Because of its remote location, the Tribe's Reservation offers limited opportunities for economic development and governmental revenue generation as well as limited employment opportunities for tribal members. The Reservation also offers a very limited tax base to fund the tribal government, because much of the Reservation land is held in trust by the United States government and thus exempt from taxation.

3. To generate revenue to fund tribal governmental services and create economic opportunities for the Tribe and tribal members, the Tribe has created several tribally owned and managed businesses under tribal law that it operates as arms of the Tribe. Great Plains Finance, LLC (GPF) is one such business, as are the holding company through which the Tribe owns GPF (GVA Holdings, LLC (GVA Holdings)) and the Fort Belknap Planning and Development Corporation, d/b/a Island Mountain Development Group (IMDG), through which the Tribe manages GPF and its other tribally owned businesses.

4. The Tribe, through a resolution its governing Council, created IMDG under tribal law to manage and coordinate the Tribe's businesses and economic development initiatives, to provide training resources and economic opportunities

for tribal members, and to generate revenue to fund the tribal government and benefit tribal members. A copy of the Council resolution establishing IMDG is attached as Exhibit A to this declaration. A copy of IMDG's Charter is attached as Exhibit B, a copy of IMDG's Articles of Incorporation is attached as Exhibit C, and a copy of IMDG's Bylaws is attached as Exhibit D.

5. Ownership of IMDG is and has always been limited to the Tribe, and the Tribe also retains control over IMDG's management and operations. This includes the rights to fill any vacancies on IMDG's Board, to remove any member of the IMDG Board, to override any action taken by the IMDG Board or any of its members, and the right of final approval or disapproval of any proposed changes to IMDG's bylaws. *See* IMDG Charter ¶¶ 4, 11.A, 11.K; IMDG Bylaws, Art. V-VI. IMDG is also required to file quarterly and annual reports with the Council detailing its financial situation and all business activity that it has undertaken or plans to undertake. IMDG Charter ¶ 10.B-C. No entity other than the Tribe has any ownership interest or share in the profitability of IMDG.

6. Currently, all members of the IMDG Board are elected members of the Tribe's governing Council. The Board retains the authority to hire and fire IMDG's CEO, who in turn has the authority to hire and fire other IMDG employees. The current IMDG CEO is tribal member Evan Azure.

7. The Tribe uses revenues generated by IMDG to fund a number of governmental services for tribal membership. These services include general funding for the Tribe's land department, Tribal Employment Rights Office, payment for tribal communication and tribal sewer and waste programs and tribal electricity.


8. IMDG revenues are the Tribe's largest source of non-federal funding. Although the number varies somewhat from year to year, they typically account for approximately 75% of the total non-federal tribal budget. Any reduction in revenues from IMDG would directly reduce the Tribe's ability to provide governmental services and diminish additional benefits and opportunities that IMDG currently provides to tribal members. Because IMDG is a critical funding source for the tribal government, the Tribe has always intended that IMDG would share in the Tribe's sovereign immunity.

9. In addition to directly distributing revenue to the Tribe, IMDG also funds or manages projects for the benefit of tribal members. In recent years, the projects have included a wellness center and housing for tribal members. These projects create additional benefits and economic opportunities for tribal members.

10. No entity outside of the Tribe has any profit share or other interest in the profitability of IMDG.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 9 day of August, 2023, at Hayden, Montana.



Jeffrey Stiffarm
President, Fort Belknap Indian Community

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2023 a true and correct copy of the foregoing was served upon the counsel of record by filing it electronically with the Court's CM/ECF system.

By: /s/ Frederick L. Whitmer
Frederick L. Whitmer